

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

JAMIE AKERS,

Plaintiff,

v.

Case No. CIV-23-1067-JD

ASTRAZENECA PHARMACEUTICALS,
L.P.,

Defendant.

JOINT MOTION FOR STAY OF PROCEEDINGS PENDING MEDIATION

COMES NOW Plaintiff Jamie Akers (“Plaintiff”) and Defendant AstraZeneca Pharmaceutical LP, and request the Court for a joint motion to stay of all proceedings and deadlines pending mediation (“Joint Motion”). In support of this Joint Motion, the Parties state as follows:

1. On October 31, 2024, the Court entered a Scheduling Order setting forth the deadlines for this case. In that Order, the Court set forth a discovery deadline of August 6, 2025; and the case is set for the Court’s December 2, 2025 trial docket. *See* Dkt. 30.
2. The Parties are exploring the possibility of settlement, and to that end, have agreed to mediate this case before JAMS mediator Hon. Donald G. Wilkerson (Ret.).
3. The Parties are working to identify a mutually available date to conduct the mediation and are also engaged in informal settlement discussions.

4. In light of the Parties' progress toward resolution, the Parties respectfully request that the Court stay all proceedings and deadlines in this matter, including a stay of discovery, for a period of sixty (60) days to allow the Parties to schedule and complete mediation.

5. Within seven days of mediation, and no later than the expiration of the stay period, the Parties request to submit a joint status report to the Court stating whether the matter has settled.

6. The Parties' proposed stay will conserve the Parties' resources and serve judicial economy while they work towards a potential resolution of this matter. *See* Fed. R. Civ. P. 1 (rules "should be construed, administered, and employed by the court and the parties to secure the just, speedy, and inexpensive determination of every action and proceeding").

7. There have been no requests for extension of time to the Scheduling Order since its date of entry.

WHEREFORE, the Parties respectfully request the Court grant this Joint Motion, and stay all proceedings and deadlines for a period of sixty (60) days, including a stay of discovery, to allow the Parties to schedule and complete mediation.

Dated: May 22, 2025

/s/ Jonathan C. Burns

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*Attorneys for Defendant AstraZeneca
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CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the Court's CM/ECF system, which will send notification to all counsel of record.

/s/ Nicholas V. Merkley

Nicholas ("Nick") V. Merkley